

In The United States District Court
For The District Of Delaware

William Joseph Webb Jr.,

Plaintiff,

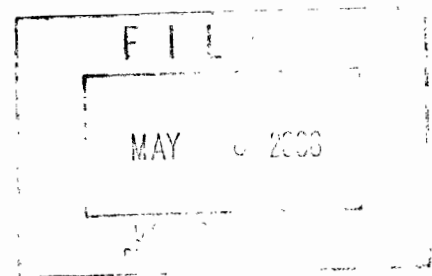
v.

First Correction Medical,

Et. Al.,

Defendants.

Civ. Act. No. 07-31-GMS



Declaration in Support of Plaintiff's Motion for the
Appointment of Counsel.

William Joseph Webb Jr. declares under penalty of perjury:

1. I am the Plaintiff in the above titled case. I make this declaration in support of My Motion for the Appointment of Counsel.
2. The Complaint in this case alleges that the Plaintiff was denied Medical, subjected to deliberate indifference, denied the

right against cruel and unusual punishment, and negligence.

3. This is a complex case because it contains several different legal claims, with each claim involving the same and different sets of defendants.

4. The case involves medical issues which will require expert testimony.

5. The necessity to depose and investigate witnesses outside the prison.

6. The plaintiff has demanded a jury trial.

7. The case will require discovery of documents that by State Statutes, Plaintiff should not possess, along with identifying missing witnesses.

8. The Plaintiff's Segregation status prohibits him from developing external factors that need to be investigated within the prison.

9. The Plaintiff is in Segregation which has extremely limited law library access, also there is and will be no ability to investigate the facts of the case, finally the injuries being

continuously suffered have the Plaintiff's life in jeopardy.

10. As set forth in the Memorandum of Law submitted with this Motion, along with the legal merit of the Plaintiff's claims, support the appointment of counsel to represent the Plaintiff.

Pursuant to 28 U.S.C. § 1746, I declare under the penalty of perjury, I, William Joseph Webb Jr. state that the foregoing is true and correct.

William Joseph Webb Jr.

William Joseph Webb Jr.

Dated: April 29, 2008